

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SHAW FAMILY ARCHIVES, LTD., :  
BRADFORD LICENSING, INC., JAMES E. :  
DOUGHERTY, and VALHALLA :  
PRODUCTIONS, LLC. : 05 CV 3939 (CM)  
Plaintiffs/Consolidated Defendants, :  
v. :  
Honorable Colleen McMahon  
CMG WORLDWIDE, INC. and MARILYN :  
MONROE, LLC, :  
Defendants/Consolidated Plaintiffs. :  
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**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that, upon the Memorandum of Law in Support of Motion for Summary Judgment, Rule 56.1 Statement of Undisputed Facts, the Declaration of Tracy Betz, the Declaration of Mark Roesler, the Declaration of Anna Strasberg, and the Declaration of Michelle M. Craven, Defendant/Consolidated Plaintiff Marilyn Monroe, LLC (“MMLLC”), by its undersigned attorneys, will move this Court, in the Courtroom of the Honorable Colleen McMahon, United States District Judge, United State Courthouse, 300 Quarropas Street, Room 533, White Plains, New York, 10601, at a time and date to be determined by the Court, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for summary judgment against Shaw Family Archives, Ltd., granting Count II of Defendants’ Complaint.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, are to be served on counsel for MMLLC two weeks after the receipt of moving papers, and reply papers, if any, are to be served five (5) business days after the service of answering papers.

DATED:      New York, New York  
October 25, 2006

Respectfully submitted,

By:      /s/ Orin Snyder  
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Michelle Craven (MC-8556)

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